REMARKS

Claims 1, 7 and 13 have been amended and new dependent claims 19-21 have been added to the application to further protect applicants' invention. Thus, claims 1, 6, 7, 12, 13, 18, and 19-21 are pending in the present application.

Amendments have been made to claims 1, 7 and 13 in order to obviate the objection to the claims by the examiner. These claims have also been amended to remove certain potential ambiguities in the claim language.

The claim have been rejected in a three-way combination under 35 U.S.C. §103 as being unpatentable over Salvo et al. in view of www.DealTime.com and Rosenberg et al. This rejection is respectfully traversed and reconsideration thereof is requested.

Applicant's claimed system is directed to an independent supply chain management system designed for managing the ordering of inventory, equipment and other items that must operate in the context of a large plurality of independent stores and distributors. Because of the large number of stores and distributors involved, and because of the fact that many of these stores and distributors are primarily independent of and not controlled by the independent supply chain management system, and thus that many of these stores and distributors make business decisions without consulting the supply chain management system, information relating to the alignment of a given store with a given distributor may have changed since the store's initial registration with the independent supply chain management system. However, the independent supply chain management system would like to be able to initiate orders for a given set of stores for additional inventory based on incoming sales data without the need to perform the extra step of contacting each store and requesting an updated registration with an updated distributor listing for that store, and then waiting for receipt of that updated information before placing a new order to replenish inventory. The way that this is accomplished automatically in the present invention to thereby delete this extra step is by taking documents that would normally flow to the supply chain management system such as data relating to the sale of goods including invoices from the distributors relating to inventory provided to the store that relate to the goods that were sold, and using those documents which are a natural byproduct of

the business, to update automatically the store-distributor alignment in the registration information. As noted above, the independent claims 1, 7, and 13 have been further amended to remove ambiguity on this point.

In this regard, the claims have been amended to clarify in the body of the claim that they relate to "an independent supply chain management system that cannot mandate store-distributor relationships for a plurality of stores in the supply chain" to thereby focus on the fact that the store-distributor alignment changes are not normally available to the independent supply chain management system for many of the stores, other then through a query and response, because the system in these cases does not control the stores or the distributors.

Note that the claim places a focus on the independent supply chain management system comparing the store identification and at least one distributor in the first information to the store identification and at least one distributor in the second information.

Overall, the present invention is directed to an environment where store-distributor alignments are unstable/dynamic in the context of a large supply chain where the stores and distributors are in many cases independent and not under the control of the independent supply chain management system.

Referring now to Salvo et al., (US 6,341,271), there is disclosed an inventory management system and method for monitoring and determining the real-time inventory status of one or more storage receptacles, such as silos at a manufacturing site, and the automatic ordering of inventory to replenish the receptacles at a lowest possible price. See column 3, lines 42-52. Salvo et al. notes that each receptacle comprises an amount indicator 108 that provides signals indicative of an inventory amount 151. In one embodiment, the indicator 108 comprises a level sensor, a weight indicator, a volume analyzer, and other devices that permit determination of the amount 151 of inventory 150 in the receptacle 104. See column 4, lines 32-41. A site controller 112 with a control unit 114 is connected to receive signals from the inventory storage receptacles. The control unit 114 determines the amount of

inventory used over time, can estimate future use, and can determine if an inventory order is needed. See column 5, lines 8-9. One of the important features of Salvo et al., is that the "system 100 does not rely upon a previously used inventory vendor, but can buy inventory from a low priced inventory vendor based on real-time inventory prices." See column 6, lines 24-27. It is further reiterated at column 6, lines 47-53 that the control unit 114 "analyses and determines a lowest total inventory purchase price vendor (low price vendor) for the inventory, where the total inventory purchase price determination includes an actual vendor inventory prices and transportation - associated costs." These statements teach away from the present claimed invention.

Accordingly, it can be seen that Salvo et al. discloses a real time inventory status system and is not related to registration, much less reviewing incoming purchase orders and making a comparison of a vendor ID in a purchase order to the vendor ID in the registration information associated with the particular store. As the examiner accurately notes in his Office Action, "Salvo does not disclose registration of suppliers etc."

Referring now to Rosenberg et al., (US 6,418,416), there is disclosed a system for controlling access to a locked enclosure and for re-ordering items for that locked enclosure. More specifically, the system includes a customer site 105 having three cabinets 110, each with a number of pockets or compartments 115 that enclose and secure articles, such as business supplies or other items that are preferably dispensed in a controlled manner. See column 3, lines 56-61. A controller 125 is used to manage access to the cabinet 110, to collect inventory and administrative data, and interface with other nodes. See column 4, lines 28-32. Automatic stocking and re-ordering of the items in the cabinet is facilitated by implementing a protocol shown in Fig. 2 of Rosenberg, et al. With respect to the re-ordering process, it is stated in column 9, beginning at line 15, that a list of companies served by a given vendor is retrieved. But applicants have found no disclosure in Rosenberg et al. relating to obtaining second identification information including a store identification and a distributor associated with the store and then having the independent supply chain management system perform a comparison step on the first identification information and the second identification information and then performing the step of the

independent supply chain management system automatically updating the distributor in the registration information for a respective store based on the comparison.

Referring now to the www.DealTime.com reference, there is disclosed a search engine that allows a consumer to designate a product and aspects of a product such as price, and to search not only across merchant sites, but also across online classifieds, person-to-person auctions and large auction sites. Dealtime does not relate to managing a supply chain including stores and distributors. Dealtime does not disclose a database with a store identification that is associated with a distributor. Dealtime does not collect data from a plurality of stores relating to the sale of goods by the given store and that includes at least one distributor associated with the store. As the examiner noted previously, Dealtime does not compare the store identification and at least one distributor in the first identification information with the store identification and at least one distributor in the second information. Finally, Dealtime does not update the registration of respective stores based on the comparison.

To summarize, there is no disclosure or suggestion in any of the references to have an "independent supply chain management system that cannot mandate store-distributor relationships for a plurality of stores in the supply chain" wherein the steps are performed of "collecting data from a plurality of stores of the supply chain utilizing the network, the data relating to the sale of goods by the stores and including second identification information including a store identification and a distributor associated with the store", the "independent supply chain management system comparing the store identification and the distributor in the first identification information with the store identification and the distributor in the second identification information" and the step of the "independent supply chain management system automatically updating the distributor in the registration information for a respective store based on the comparison." Accordingly, even if this three-way combination of references could be made (which in this case it cannot because of the divergent teachings in these references), none of these three references discloses the basic steps set forth in the claims of applicants invention.

Claims 7 and 12 describe and claim the invention in a system context. Likewise, claims 13 and 18 claim the invention in a computer program product context. These claims are not disclosed or suggested by the three-way reference combination for the reasons stated previously. Accordingly, withdrawal of the rejection of these claims is respectfully requested.

Three new claims 19-21 have been added to the application to further protect applicants invention. These claims are dependent claims that depend, respectively, from the three independent claims in the application and cover the aspect of generating an order for goods to the updated distributor in the registration information. There is no disclosure in any of the references of the operation of generating an order for goods based on the updated distributor in the registration information.

In view of the foregoing remarks, the application is considered to be in a condition for allowance. Early passage to issue of the application is respectfully requested.

Respectfully submitted,

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